

JONATHAN MATTHEW BAUM (CSBN: 303469)  
STEPTOE & JOHNSON LLP  
One Market Street  
Steuart Tower, Suite 1070  
San Francisco, CA 94105  
Telephone: (510)735-4558  
Email: jbaum@steptoe.com

Attorney for Defendant  
MICHAEL RICHARD LYNCH

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH,

Defendant.

Case No.: 3:18-CR-00577-CRB

**MOTION FOR LEAVE TO CHANGE  
ADDRESS AND TO CLARIFY RELEASE  
CONDITIONS AND [PROPOSED] ORDER**

Judge: Hon. Charles Breyer

In its Order dated May 11, 2023, the Court stated that “Defendant shall be confined to an address in the City and County of San Francisco, subject to the approval of the United States Attorney’s Office and the Court[.]” (Dkt. No. 146, at 9.) That initial residence was an Airbnb, which is soon expiring, and Defendant requests the Court’s permission to relocate to a new residence, which has been provided to Pretrial Services and the United States Attorney’s Office. The new address, at 2715 Scott St., is approximately two blocks away from the prior residence.

Pretrial Services and the U.S. Attorney’s Office have confirmed that they do not object to the address change. Therefore, Defendant respectfully requests the Court’s authorization to change his address, where he will be subject to continued supervision by Pretrial Services and the private security detail that has been engaged.

1           Lastly, Defendant asks the Court to clarify one issue about his release conditions. At the  
2 hearing on May 11, 2023, the Court stated, “Defendant shall remain at his residence at all times  
3 except for **religious services**, any medical, substance abuse or mental health treatment, attorney  
4 visits, court appearances, **court approved obligations**, or other activities approved in advance  
5 by the court.” Exhibit 1, Transcript of May 11, 2023 hearing, at p. 24 (emphasis added).  
6 However, on the Conditions of Release and Appearance form that was filed on May 12, 2023,  
7 the Court did not check the boxes on the first page that correspond to “religious services” and  
8 “court-approved obligations.” (Dkt. No. 157, at 1.) Pretrial has confirmed that it will follow the  
9 written Conditions of Release and Appearance form, and that it requires a Court order to clarify  
10 this apparent conflict. Defendant therefore respectfully requests that the Court enters an order  
11 clarifying that the terms imposed are the terms the Court stated on May 11, 2023.

12  
13  
14  
15 DATED: May 23, 2023

STEPTOE & JOHNSON LLP

16  
17 By: /s/ Jonathan Baum  
18 JONATHAN BAUM

19 Attorney for Defendant  
20 MICHAEL RICHARD LYNCH  
21  
22  
23  
24  
25  
26  
27  
28